Tracey Lyn Jarzombek, Esq., (TJ-3972) White & McSpedon, P.C. 875 Avenue of the Americas, Suite 800 New York, NY 10001 212-564-6633

Attorneys for Defendants: CITIGROUP I/S/H/A CITIBANK, N.A. (solely in connection with their alleged ownership or occupancy of 120 Broadway)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

21 MC 102 (AKH) RICHARD ROSS (AND WIFE, ANN ROSS)

Plaintiffs,

-against-

NOTICE OF ADOPTION OF ANSWER TO MAST COMPLAINT

Index No.: 06-CV-15022

120 BROADWAY CONDOMINIUM (CONDO #871), ET. AL.,

ELECTRONICALLY FILED

Defendants.

PLEASE TAKE NOTICE, that defendants, CITIGROUP I/S/H/A CITIBANK, N.A. (solely in connection with their alleged ownership or occupancy of 120 Broadway), by their attorneys, White & McSpedon, P.C., as and for their Response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopt their Answer to Master Complaint dated July 31, 2007, which was filed in the matter of In Re World Trade Center Lower Manhattan Disaster Site Litigation, 21 MC 102 (AKH).

WHEREFORE, the defendants, CITIGROUP I/S/H/A CITIBANK, N.A. (solely in connection with their alleged ownership or occupancy of 120 Broadway), demand judgment dismissing the abovecaptioned action as against them, together with their costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York September 5, 2008

Yours etc.,

WHITE & MCSPEDON, P.C.

By:

Tracey Lyn Jarzombek, Esq. (3972) 875 Avenue of the Americas, Suite 800

New York, NY 10001

(212) 564-6633

Attorneys for Defendants

CITIGROUP I/S/H/A CITIBANK, N.A. (solely in connection with their alleged ownership or

occupancy of 120 Broadway)

TO:

(Service via electronic Pacer filing)

WORBY GRONER & NAPOLI BERN, LLP Plaintiffs Liaison In Re Lower Manhattan Disaster Site Litigation 115 Broadway, 12th Floor New York, NY 10006 212-267-3700

LAW OFFICES OF GREGORY J. CANNATTA 233 Broadway, 5th Floor New York, NY 10279

All Defense Counsel